



THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

MICHAEL A. CARDOZO  
Corporation Counsel

JEFFREY A. DOUGHERTY  
Special Assistant Corporation Counsel  
Room 3-126  
Telephone: (212) 788-8342  
Facsimile: (212) 788-9776  
[jdougher@law.nyc.gov](mailto:jdougher@law.nyc.gov)

October 18, 2006

**BY FACSIMILE**

The Honorable James C. Francis IV  
United States Magistrate Judge, Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 1960  
New York, New York 10007-1312

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 10/19/06

Re: Rigger v. City of New York, et al. 05 CV 9882 (KMK) (JCF)

Dear Judge Francis:

On behalf of plaintiff and defendants, I write to request a modification of the Case Management Order ("CMO") in this case. The parties currently are focused on the consolidated discovery, which is continuing. Both sides need additional time for other discovery including depositions of non-consolidated defense witnesses, plaintiff and third party witnesses. Accordingly, plaintiff and defendants jointly request that the Court grant a 3-month extension on all deadlines in the CMO in this case. If this meets with your approval, would you please "so order" it? Thank you. //

Very truly yours,

*Jeffrey A. Dougherty*  
Jeffrey A. Dougherty

cc: Norman Fredrick Best, Esq. (by Facsimile)

10/19/07  
Application granted.  
SO ORDERED.  
*James C. Francis IV*  
USMJ